

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

JUAN LOZADA-LEONI,
Plaintiff,

v.

MONEYGRAM INTERNATIONAL, INC.,
And MONEYGRAM PAYMENT
SYSTEMS, INC.,
Defendants.

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CASE NO. 4:20-cv-00068-RWS-CMC

JURY TRIAL DEMANDED

**MOTION TO STAY UNOPPOSED MOTION FOR
WITHDRAWAL OF COUNSEL**

TO THE HONORABLE JUDGE OF SAID COURT:

On Tuesday, April 7, 2020 (yesterday) Attorney Steve Kardell of the law firm of Kardell Law Group PC filed an Unopposed Motion to Withdraw as Counsel for Plaintiff Juan Lozada-Leoni, and also indicated therein that Plaintiff will continue to be represented by other counsel of record, Theodore Garber of The Law Office of Juan Antonio Lozada, PLLC.

At the same time (and unbeknownst to Mr. Kardell) Mr. Garber filed the following: [Dkt. 61] Response to Non-Motion, Regarding Juan Lozada's Pro Hac Vice Application filed by Juan Lozada Leoni. (Attachments: # (1) Text of Proposed Order)(by Garber, Theodore).

Kardell is still an attorney of record in the above-referenced matter. Notwithstanding Kardell's instructions to both Garber and Lozada-Leoni to provide him with a pre-filing copy of any documents filed in this matter, Kardell was not provided a copy of same prior to its filing.

Kardell hereby requests that before his Motion to Withdraw is granted, Kardell be given an opportunity to clarify certain representations contained in Garber's Response to Non-Motion.

A short stay herein, allowing Kardell continued standing to participate in these proceedings, will provided needed clarity to this somewhat convoluted aspect of this case.

Respectfully submitted,

KARDELL LAW GROUP



By: _____
Steve Kardell

Date: _____ April 8, 2020

Steve Kardell
Texas State Bar No. 11098400
E-mail: skardell@kardelllawgroup.com

KARDELL LAW GROUP
4514 Cole Avenue, Suite 600
Dallas, Texas 75205
Telephone: 214-616-4654
Facsimile: 469-729-9926

**ATTORNEY FOR PLAINTIFF,
JUAN LOZADA-LEONI**

CERTIFICATE OF CONFERENCE

Steve Kardell, counsel for Plaintiff, Juan Lozada-Leoni, conferred with all counsel on April 8, 2020, and represents the following:

- that this Motion is unopposed by Defendants; and
- that this Motion is opposed by Theodore Garber, on behalf of Plaintiff Juan Lozada-Leoni.

/s/ Steve Kardell
Steve Kardell

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of April 2020, a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV- 5(a)(3)(A). Pursuant to Fed.R.Civ.P. 5(d) and Local Rule CV-5(e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of this document via e-mail, facsimile and/or U.S. First Class Mail.

/s/ Steve Kardell
Steve Kardell